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Law Clerk

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

FRANCISCO JAVIER LOPEZ MADRID,
Defendant.

CASE NO. CR 14-38

**STIPULATION AND [PROPOSED] ORDER
RE BRIEFING SCHEDULE AND EXCLUSION
OF TIME UNDER THE SPEEDY TRIAL ACT**

The defendant, Madrid Lopez, represented by Jodi Linker of the Federal Public Defender's Office, and the government, represented by Marc Price Wolf, Special Assistant United States Attorney, appeared before the Court on July 10, 2014 for a status hearing. The Court previously denied the Defendant's motion to dismiss on June 25, 2014. On July 10, 2014, the parties agreed to submit a briefing schedule to the court for a motion to suppress.

The parties hereby stipulate and agree that the motion shall be submitted by July 31, 2014. The government's opposition shall be submitted by August 14, 2014. A reply shall be submitted by August

FILED

JUL 16 2014

**RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

1 28, 2014. A hearing shall be held in front of the Honorable Maria-Elena James on September 4, 2014 at
2 10:00 a.m.

3 The parties further agreed to exclude time from June 25, 2014 until September 4, 2014. The
4 basis of this exclusion is to ensure that counsel has the reasonable time necessary for effective
5 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A). The ends of
6 justice served by excluding the time between July 10, 2014 and September 4, 2014 from computation
7 under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.
8 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

9
10 It is so stipulated.

11 DATED: July 15, 2014

Respectfully Submitted,


12 MELINDA HAAG
13 United States Attorney

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15 /s/
16 MARC PRICE WOLF
17 Special Assistant United States Attorney

18
19 /s/
20 JODI LINKER
21 Attorney for Defendant Madrid Lopez

22 IT IS SO ORDERED

23 DATED: 7/16/14

24 
25 ~~MARIA ELENA JAMES~~ **MARIA ELENA JAMES**
26 United States Magistrate Judge